

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSE  
NASHVILLE DIVISION**

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UNITED STATES OF AMERICA,	:
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Plaintiff,	:
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<i>ex rel.</i> ,	:
	:
JAMES DOGHARAMJI; SHEREE COOK;	:
and RACHEL BRYANT,	CASE NO. 3:11-cv-0442 (Sharp, J.)
	:
	:
Relators,	:
	:
v.	:
	:
COMMUNITY HEALTH SYSTEMS, INC.	:
<i>et al.</i>	:
	:
Defendants.	:
	:
	:

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**DOGHARAMJI RELATORS' SUPPLEMENTAL MEMORANDUM IN SUPPORT OF  
JOINT MOTION FOR ENTITLEMENT TO ATTORNEYS' FEES, COSTS, AND  
EXPENSES**

Pursuant to a briefing schedule established by Magistrate Judge Griffin, the Doghramji Relators have joined a consolidated motion in which the relators in four settled *qui tam* actions ask this Court to determine that they are all entitled to an award of attorney's fees and litigation expenses pursuant to the global settlement agreement with Defendants that resolved all four cases. For the reasons set forth therein, the Court should determine that all relators in these four matters are entitled to an award of attorney's fees and litigation expenses, and the Court should reject as moot the Defendants' asserted first-to-file and public disclosure defenses.

In the alternative, should the Court instead determine that the Defendants' first-to-file and public disclosure defenses warrant substantive analysis, the Doghramji Relators will prove that neither defense bars them from receiving an award of fees and expenses. Rather than addressing

the Defendants' arguments before the Defendants have articulated them in this round of briefing, however, the Doghramji Relators intend to respond to the Defendants' arguments in their reply brief<sup>1</sup>, for which they will respectfully file a motion to exceed the Court's default 5-page limit.

In sum, should the Court reject the arguments set forth in the relators' consolidated motion, then the Doghramji Relators respectfully ask the Court to reject the Defendants' first-to-file and public disclosure defenses and to determine that the Doghramji Relators are entitled to an award of attorney's fees and litigation expenses.

Date: April 28, 2015

Respectfully submitted,

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<sup>1</sup> The operative briefing schedule permits the Defendants to file a sur-reply. Thus, the Defendants' response to this alternative motion (if relevant at all) will function much like a motion to dismiss the Doghramji Relators' fee/expense claim based on the first-to-file and public disclosure bars, and the subsequent reply and sur-reply will function like a response and reply.

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*\*Motion for admission pro hac vice forthcoming*

*Attorneys for Relators*

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing *Doghramji Relators' Supplemental Motion to Reject Defendants' First-to-File and Public Disclosure Defenses* has been served on the following via the Court's ECF filing system on April 28, 2015:

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